

Estimated Hearing Date: To be announced by Court

Objection Deadline: To be announced by Court

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of  
THE COMMONWEALTH OF PUERTO RICO,  
*et al.*

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**PLAINTIFF BLANCA IRIS MARRERO'S**  
**MOTION FOR BRIEF EXTENSION OF TIME TO FILE AGREEMENT WITH**  
**DEBTORS**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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TO THE HONORABLE LAURA TAYLOR SWAIN,  
UNITED STATES DISTRICT JUDGE:

COMES Now, State Court Plaintiff Blanca Iris Marrero (“claimant”), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On June 12, 2022 at ECF No. 21192 the appearing claimant filed her application for payment of administrative expenses on account of a civil tort claim filed at the Puerto Rico Court of First Instance, San Juan Superior Part.
2. On August 26, 2022 at ECF 21931 the Debtors Commonwealth of Puerto Rico (“Commonwealth”) and Public Buildings Authority (“PBA”) filed their objection to claimant’s application.
3. As stated to this Honorable Court in previous motions, Counsel for the Commonwealth and the PBA, and the appearing creditor, after several conferences, have made substantial advances in the processing of this matter and have exchanged drafts of a proposed settlement agreement which will put to an end this contested matter.
4. The most recent draft stipulation agreement which would settle the pending controversy was sent by the appearing creditor to the Proskauer law firm, counsel for the Commonwealth and PBA, and approved by the appearing creditor. Counsel for the Commonwealth and PBA recently informed that they needed to discuss the amended document with the Commonwealth and PBA and receive feedback from them, and as a result had graciously consented that the appearing party be granted until Friday, March 24, 2023 to file her reply to their opposition to the application for payment of administrative expenses, or alternatively for the parties to this contested matter to file their stipulation settling the case, which is very likely at present. It appears that counsel handling this matter on behalf of the Commonwealth was outside the office these past days.

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5. The stipulation terms have been accepted by appearing creditor and all that is pending is to file the executed agreement before this Honorable Court. The appearing creditor is waiting to hear from the Proskauer firm to that effect.

### **NOTICE**

Notice of this Motion has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtor's Claims and Noticing Agent, by e-mail or by first-class mail.

No prior request for the relief sought herein has been made to this Court or to any other court.

WHEREFORE, the appearing Claimant respectfully requests that this Court allow the parties to file their agreement by Monday, April 10 2023, or such other time as the Proskauer firm may need on behalf of the Government, and that the hearing on the issue be set aside upon the filing of the executed settlement agreement.

RESPECTFULLY SUBMITTED.

Dated: March 30, 2023

Respectfully submitted,

s/ Fernando Van Derdys, Esq.

USDC-PR 201913

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